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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Allocation of Spectrum Below) ET Docket No. 94-32
5 GHz Transferred from)
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To: Chief, Office of Engineering and Technology

REPLY COMMENTS OF THE ALARM INDUSTRY COMMUNICATIONS COMMITTEE

The Alarm Industry Communications Committee (AICC), by its attorney, hereby submits Reply Comments in response to the FCC's October 20, 1994 Notice of Proposed Rule Making (NPRM) and the record in the above captioned proceeding. For the reasons given below, AICC supports the Comments filed by the Industrial Telecommunications Association (ITA). Those comments correctly point out that leaving spectrum decisions to auction winners would freeze out noncommercial services such as Business Radio and Public Safety users and would skew the wireless communications market toward commercial mobile radio services.

AICC is a standing committee of the Central Station Alarm Association. Its primary function is to represent the electronic security industry in all aspects of telecommunications and radio frequency matters. It is comprised of both members which are themselves associations and of individual alarm companies.

One of the principal concerns of AICC in recent years has been

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the lack of availability of clear frequencies for short-range (within the premises) and long range (up to about 30 miles) radio communications which are used to transmit alarm signals to warn of intrusions, fires and other emergency conditions at premises under the protection of AICC member companies. AICC members have used frequencies available on an unlicensed basis under Part 15 of the Commission's Rules, as well as frequencies under Part 90 of the FCC rules, for which licenses are required.

As local city and county governments increasingly face budget deficits and are unable to provide the police, fire and emergency life support services that the public requires, the public has increasingly turned to the private sector to provide these services. To a large extent, services are provided over wireline telephone circuits. However, some alarm circuits are very difficult to provide in this manner; and insurance underwriters usually require an alternate means of alarm signal transmission for certain high risk accounts. In addition, wireless signals are more difficult to compromise than wireline signals, which can be disrupted by cutting a wire. Thus, use of radio is of increasing importance to private alarm services.

As the lower frequencies become more congested, AICC members look toward new spectrum to provide safety and security services to the public in the future. Therefore, AICC is concerned that all of the new frequencies proposed for reallocation from federal

government use not be earmarked for commercial mobile services. Some of this spectrum should be made available to non-commercial uses, such as the wireless alarm signalling operations of AICC members, as well as other public safety and business radio operations.

Of the 50 MHz of spectrum in three frequency bands proposed to made available in this proceeding, AICC suggests that a few megahertz be made available for various non-commercial uses, particularly alarm signalling and other public safety operations. AICC suggests that this spectrum come from the lowest band of frequencies proposed, namely, the 2390-2400 MHz band, although the band 2402-2417 would also be acceptable.

Respectfully submitted,

The Alarm Industry Communications Committee

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